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# TRANSMITTAL OF APPEAL BRIEF (Large Entity)

Docket No.  
END920010097US1

In Re Application Of: Glenn C. Godoy et al

| Application No. | Filing Date | Examiner           | Customer No. | Group Art Unit | Confirmation No. |
|-----------------|-------------|--------------------|--------------|----------------|------------------|
| 10/042,403      | 01/09/2002  | Cam Linh T. Nguyen | 26502        | 2161           | 9024             |

Invention: COMMON BUSINESS DATA MANAGEMENT

## COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on

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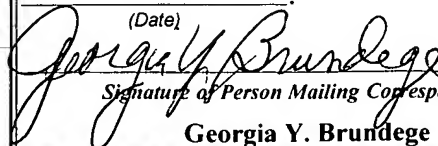
Dated: 06/09/05

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I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on

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cc: Records



Docket No.: END920010097US1

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In Re Patent Application of: Glenn C. Godoy et al

Group Art Unit: 2161 : IBM Corporation  
Examiner: Cam Linh T. Nguyen : Intellectual Property Law  
Serial No.: 10/042,403 : Department IQ0A/040-3  
Filed: 01/09/2002 : 1701 North Street  
Title: COMMON BUSINESS DATA : Endicott, New York 13760  
MANAGEMENT

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on 06/09/05.

*Georgia Y. Brundage*  
Georgia Y. Brundage

6/9/05  
Date

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**APPEAL BRIEF**

Dear Sir:

Appellants hereby appeal from the Final Action of 01/03/2005 and the Advisory Action of 03/28/2005, and offer the following arguments in support thereof.

**(i) REAL PARTY IN INTEREST**

The real party of interest is International Business Machines Corporation, a corporation of New York, with a place of business at Armonk, NY 10504.

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**(ii) RELATED APPEALS AND INTERFERENCES**

There are no related appeals or interferences with which the undersigned is aware.

**(iii) STATUS OF CLAIMS**

Claims 1 - 19 are pending in the present application. Claims 1 - 19 have all been finally rejected and are the subject matter of this appeal.

**(iv) STATUS OF AMENDMENTS**

An Amendment after the Final Action of 01/03/2005 was filed 03/02/2005. The Examiner's Advisory Action of 03/28/2005 maintains the final rejection, however, for purposes of appeal, the amendment will be entered.

**(v) SUMMARY OF CLAIMED SUBJECT MATTER**

Appellants' invention relates to a unique method, system, and program product for maintaining common business data for a plurality of computer applications. Each application requires business control data to be set up and maintained in order to run the application. In many cases, the business control data required for one application is the same data required by another application. However, because the computer applications are separate and usually independently developed and independently installed, differing solutions are created as part of each application to perform the same data set up and maintenance tasks on much of the same data. Consequently, maintaining and updating control data as it changes is a very complicated and time consuming task requiring each application be checked and updated as necessary.

Appellants' claimed subject matter provides a novel solution

to this situation through use of a common database. A model of business rules which extend across i.e. (that is) span, a plurality of applications. These rules are built into the common database. Business control data is entered into this common database. The appropriate portions of the business control data is then disseminated to the plurality of applications according to the business rules.

**(vi) GROUND OF REJECTION**

There are two grounds of rejection. Claims 1, 6 - 10, and 15 - 19 have been rejected under 35 U.S.C. 102(b) as being anticipated by Iyengar et al. (US Patent 6,018,627).

All of the remaining claims, claims 2 - 5 and 11 - 14 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Iyengar in view of Souder et al. (US Patent 5,724,556).

**(vii) ARGUMENT**

Claims 1, 6 - 10, and 15 - 19 are patentable under 35 U.S.C. 102(b) over the prior art and, particularly, US Patent 6,018,627 (Iyengar).

Iyengar does not disclose the present invention since, among other things, Iyengar does not disclose developing a model of business rules spanning a plurality of applications as clearly recited in Appellants' independent claims 1 and 19, or a business model having a plurality of applications as recited in independent claim 10. Iyengar describes entities and objects stored in his repository 20, (column 4, lines 28 - 31). However, Iyengar clearly recites a single application, the application under development (column 4, line 29). Furthermore, in column 4, lines 31 - 33, Iyengar gives an example which clearly describes

an application (column 4, line 33), i.e., a single application.

Appellants' independent claims 1, 10, and 19 require rules spanning or having a plurality of applications.

Iyengar also describes in column 3, lines 60 - 63, legacy items which may include pre-existing applications. The discovered legacy items may then be transformed into business or object models, or into reusable components. Here, Iyengar uses the plural word "applications." However, there is no description or suggestion that the business or object models resulting from transforming the legacy items are common between individual applications, i.e., span a plurality of applications as required by Appellants' independent claims 1 and 19.

The Examiner's explanation in the Advisory Action of 03/28/2005 states that this claim language of "spanning a plurality of applications" does not suggest that the model of business rules must be common between applications. Appellants respectfully disagree. A common dictionary definition of the word "span" is "to extend across: *a career that spanned 40 years*" See the American Heritage Dictionary, Second College Edition, Houghton Mifflin, Boston, 1985, p. 1170, third definition. Referring, for example, to Appellants' claim 1, clearly the model of business rules that is developed must span, i.e., extend across, a plurality of applications. Iyengar merely states that the legacy items for each application may be transformed into business or object models. There is no description that these are common between or extend across a plurality of applications. Iyengar therefore fails to anticipate Appellants' invention of independent claims 1, 10, and 19. These claims are allowable.

All of Appellants' other pending claims depend directly or indirectly on these independent claims and therefore also require these features.

Appellants' position therefore is that rejection of the pending claims is in error and must be withdrawn. All of the claims are allowable under 35 U.S.C. 102(b) over Iyengar.

Under the second grounds of rejection, claims 2 - 5 and 11 - 14 were rejected under 35 U.S.C. 103(a) as unpatentable over Iyengar in view of Souder. However, this rejection is moot in view of the arguments above. This rejection must also be withdrawn.

In view of the above, Appellants respectfully request that the Board reverse the Examiner's final rejection of all of the claims on appeal, and allow these claims.

Respectfully submitted,

Dated: 06/09/05

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(viii) CLAIMS APPENDIX

1 1. A method of updating business control data, comprising the  
2 steps of:

3 developing a model of business rules spanning a plurality of  
4 applications and building said rules into a common database;

5 entering business control data into said common database; and

6 disseminating to said plurality of applications, respective  
7 portions of said business control data according to said business  
8 rules.

9 2. The method of claim 1, wherein said rules are built to define  
10 a dissemination structure.

11 3. The method of claim 2, wherein said structure has a plurality  
12 of instances of said common database.

13 4. The method of claim 3, wherein said plurality of instances  
14 run on a corresponding plurality of servers located in  
15 corresponding geographical locations.

16 5. The method of claim 4, wherein said geographical  
17 locations are in disparate continents.

1 6. The method of claim 1, wherein said business control data is  
2 entered into said common database using a common data  
3 administration application.

4 7. The method of claim 6, wherein said common data  
5 administration application is adapted to receive input from  
6 logged on individuals and from an automated feed from a source  
7 system.

8 8. The method of claim 6, further comprising the step of  
9 entering additional rules into said common data administration  
10 application.

11 9. The method of claim 8, wherein said business control data is  
12 entered into said common database according to said additional  
13 rules.

14 10. A system for updating business control data, comprising:

15 a relational database having rules defining a business model  
16 having a plurality of applications;

17 business control data in said relational database; and

18 dissemination means coupled to said relational database for  
19 disseminating said business control data to said plurality of  
20 applications according to said business rules.



1 11. The system of claim 10, wherein said rules define a  
2 dissemination structure.

3 12. The system of claim 11, wherein said structure has a  
4 plurality of instances of said relational database.

5 13. The system of claim 12, wherein said plurality of instances  
6 run on a corresponding plurality of servers located in  
7 corresponding geographical locations.

8 14. The system of claim 13, wherein said geographical locations  
9 are in disparate continents.

10 15. The system of claim 10, further comprising a common data  
11 administration application coupled to said relational database  
12 for entering said business control data into said relational  
13 database.

14 16. The system of claim 15, wherein said common data  
15 administration application is adapted to receive input from  
16 logged on individuals and from an automated feed from a source  
17 system.

18 17. The system of claim 15, further comprising additional rules  
19 in said common data administration application.

1 18. The system of claim 17, wherein said common data  
2 administration application is adapted to enter said business  
3 control data into said relational database according to said  
4 additional rules.

5 19. A computer program product for instructing a processor to  
6 maintain business control data, said computer program product  
7 comprising:

8 a computer readable medium;

9 first program instruction means for developing a model of  
10 business rules spanning a plurality of applications and building  
11 said rules into a common database;

12 second program instruction means for entering business control  
13 data into said common database; and

14 third program instruction means for disseminating to said  
15 plurality of applications, respective portions of said business  
16 control data according to said business rules; and wherein

17 all three of said program instruction means are recorded on said  
18 medium.